

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

Applications of)	
)	
AIR TRAN AIRWAYS, INC.)	
COMAIR, INC.)	
MIDWEST AIRLINES, INC.)	DOCKET OST-2000-7182
PRIMARIS AIRLINES, INC.)	
SPIRIT AIRLINES, INC.)	
US AIRWAYS, INC.)	
)	
under 49 U.S.C. §41718(a) for inside-)	
perimeter Ronald Reagan Washington)	
National Airports slots)	
)	

**SUPPLEMENTAL COMMENTS OF PRIMARIS AIRLINES, INC. AND
MOTION FOR LEAVE TO FILE**

Communications with respect to this document should be addressed to:

Mark G. Morris
Chief Executive Officer
PRIMARIS AIRLINES, INC.
375 East Warm Springs Road, Suite 201
Las Vegas, NV 89119
(702) 270-0999 (phone)
(702) 920-8148 (facsimile)

Gregory S. Walden
PATTON BOGGS LLP
2550 M Street NW
Washington, DC 20037-1350
(202) 457-6135 (phone)
(202) 457-6315 (facsimile)
gwalden@pattonboggs.com

February 27, 2004

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**SUPPLEMENTAL COMMENTS OF PRIMARIS AIRLINES, INC. AND
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Primaris Airlines, Inc. (“Primaris”) hereby seeks leave to file this supplemental pleading in response to a common argument presented in the Consolidated Answers filed on behalf of the five competing Applications in this proceeding, and to present further public support of its Application for slot exemptions at Ronald Reagan Washington National Airport (“DCA”).¹

¹ In support of its motion for leave to file, Primaris submits that these Supplemental Comments provide the Department with the most current and accurate information about its projected date to begin operations and provides additional public support for its Application for slot exemptions to conduct twice-daily service between DCA and Lambert-St. Louis International Airport. These Supplemental Comments will not prejudice any other Applicant in this proceeding.

1. As Primaris explained in its Application and its Consolidated Answer, at n. 1, Primaris “is currently in the final stages of FAA certification. Primaris expects to achieve its funding objectives within sixty to ninety days and thus receive effective authority from the Department to begin operations in the spring.” Several competing Applicants urge the Department to deny Primaris’ Application because they assert it is uncertain when Primaris will receive FAA certification, receive effective authority from the Department, obtain funding necessary to receive such authority, and begin operations. None of these reasons warrants a rejection or denial of Primaris’ Application.

First, Primaris expects to receive an air carrier certificate and operations specifications from the Federal Aviation Administration by the middle of April. Subsequent to the filing of Consolidated Answers in this proceeding, the FAA confirmed this projected timetable in a letter to the Department.

Second, Primaris has engaged the firm of Blaylock and Partners, L.P., (“Blaylock”) to serve as its financial adviser and placement agent in raising up to \$75 million. Blaylock has written a letter to the Department, which has been placed under seal, expressing its optimism that the funds necessary for Primaris to receive effective authority from the Department and begin operations will be secured within 45 to 90 days (between April 12 and May 27).

Thus, if awarded slot exemptions by the Department, Primaris expects to be authorized and able to conduct operations using these slots within a reasonable time

following the Department's decision awarding the slot exemptions.²

2. Primaris also submits in Exhibit PI-2 additional support for its proposal for twice-daily service between Lambert-St. Louis International Airport and Reagan National Airport. These letters, also from key public officials and the business community, echo the substantial support noted in Primaris' Consolidated Answer and included as Exhibit PI-1. Attached to this Supplemental Comments as Exhibit PI-2 are additional letters in support of Primaris' Application from the following persons:

- Representative William Lacy Clay (D-Mo.)
- Representative Jo Ann Emerson (R-Mo.)
- Carol Moody, President, St. Louis Convention & Visitors Commission
- Kathleen T. Osborn, Executive Director, The Regional Business Council, a consortium of 95 CEOs of the St. Louis region's largest mid-cap companies
- David W. Kemper, President, Civic Progress, an organization of the CEOs of the 30 leading companies in St. Louis
- Daniel P. Mehan, President/CEO of Missouri Chamber of Commerce, the largest statewide employer organization in Missouri

Also, on February 5, 2004, the Missouri State Senate adopted Senate Concurrent Resolution 33, endorsing Primaris' Application to conduct nonstop DCA-STL operations, by a unanimous vote of 32-0. A copy of that Resolution, submitted by President Pro Tem Peter D. Kinder, is also included in this Exhibit, along with Senator Kinder's letter to Secretary Mineta.

² Vision 100 requires the Department to issue its decision no later than 90 days from the date of the Applications (January 9, 2004), or April 8, 2004. 49 U.S.C. § 41718(d). In previous slot exemption proceedings, the Department has given slot recipients between 60 and 120 days to initiate operations using the slot exemptions. Order 2000-7-1 (July 5, 2000)(60 days); Order 2000-7-2 (July 5, 2000)(60 days); Order 2001-6-20 (June 22, 2001)(approximately 120 days); Order 2002-11-20 (Nov. 27, 2002) (approximately 60 days); Order 2003-1-16 (Jan. 22, 2003)(90 days). Primaris fully expects to meet the Department's standard conditions.

Resolution 33 was referred to the Missouri House of Representatives. The House Rules Committee passed the Resolution unanimously on February 26. The Resolution is expected to be adopted by the full House in the near future.

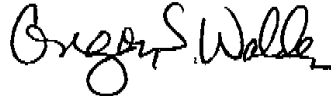
Respectfully submitted,



Gregory S. Walden
Patton Boggs, LLP
2550 M Street, NW
Washington, DC 20037-1350
Counsel for Primaris Airlines, Inc.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing Supplemental Comments of Primaris Airlines, Inc. in Docket 2000-7182 has this day been served on all parties identified below via e-mail unless otherwise indicated.



Gregory S. Walden

February 27, 2004

Brian Meehan
Federal Aviation Administration
brian.ctr.Meehan@faa.gov

Lorelei Peter
Office of Chief Counsel
Federal Aviation Administration
loirelei.peter@faa.gov

Jeffrey A. Manley
Cathleen P. Peterson
Wilmer, Cutler & Pickering
(for United and United Express)
jmanley@wilmer.com
cpeterson@wilmer.com

Joel Stephen Burton
O'Melveny & Myers LLP
(for US Airways, US Airways Express and US Airways Shuttle)
jburt@omm.com

Elizabeth K. Lanier
Howard Kass
U.S. Airways
elanier@usairways.com
hkass@usairways.com

Robert E. Cohn
Alexander Van der Bellen
Shaw Pittman
(for Comair, Delta, Delta Express and Delta Shuttle)
robert.cohn@shawpittman.com
sascha.vanderbellen@shawpittman.com

Carl B. Nelson
American Airlines, Inc.
carl.nelson@aa.com

R. Bruce Keiner
Lorraine B. Halloway
Crowell & Moring
(for Continental and Continental Express)
rbkeiner@cromor.com
lhalloway@cromor.com

Megan Rae Rosia
Northwest Airlines
megan.rosia@nwa.com

Joanne W. Young
David Kirstein
Baker Hostetler
(for America West)
jyoung@bakerlaw.com
dkirstein@bakerlaw.com

Marshall S. Sinick
Squire Sanders & Dempsey
(for Alaska Airlines and ATA)
msinick@ssd.com

Edward P. Faberman
Ungaretti & Harris
(for Frontier, Air Tran Airways, and Colgan)
epfaberman@uhlaw.com

Anita Mosner
Garkinkle Wang Seiden & Mosner PLC
(for Spirit Airlines)
amosner@gcwconsulting.com

Sascha Van der Bellen
Shaw Pittman
(for Midway Airlines)
sascha.vanderbellen@shawpittman.com

Robert P. Silverberg
Silverberg, Goldman & Bikoff LLP
(for Midwest Airlines)
rsilverberg@sgbdc.com

James A. Wilding
President and CEO
Metropolitan Washington Airports Authority
wildingj@mwaa.com

Edward S. Faggen
General Counsel
Metropolitan Washington Airports Authority
faggene@mwaa.com

Christopher Browne
Airport Manager
Ronald Reagan Washington National Airport
Washington DC 20001
christopher.browne@mwaa.com

Honorable Rod A. Blagojevich
Governor, State of Illinois
governor@state.il.us

Honorable Richard J. Durbin
United States Senate
By fax: (202) 228-0400 and
e-mail: dick@durbin.senate.gov

Honorable Peter G. Fitzgerald
United States Senate
By fax: (202) 228-1372

Honorable Richard M. Daley
Mayor, City of Chicago
By fax: 312-744-8045

Erin O'Donnell
Deputy Commissioner
Chicago Midway Airport
By fax: 773-838-0588

Thomas Walker, Commissioner
Chicago O'Hare International Airport
By fax: 773-686-3424 and
e-mail: twalker@ohare.com

Honorable Bob Holden
Governor, State of Missouri
By fax: 573-751-1495 and
e-mail: mogov@mail.state.mo.us

Honorable Christopher S. "Kit" Bond
United States Senate
By fax: (202) 224-8149
e-mail: kit_bond@bond.senate.gov

Honorable Jim Talent
United States Senate
By fax: (202) 228-1518
E-mail: senator_talent@talent.senate.gov

Honorable Francis G. Slay
Mayor, City of St. Louis
By fax: 314-622-4061

Leonard L. Griggs
Director, Lambert-St. Louis International Airport
By fax: 314-426-5733